

1 George Torgun (Bar No. 222085)
2 Sejal Choksi-Chugh (Bar No. 222093)
3 SAN FRANCISCO BAYKEEPER
4 785 Market Street, Suite 850
5 San Francisco, California 94103
6 Telephone: (415) 856-0444
7 Facsimile: (415) 856-0443
8 Email: george@baykeeper.org
9 Email: sejal@baykeeper.org

10 Attorneys for Plaintiff
11 SAN FRANCISCO BAYKEEPER

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SAN FRANCISCO BAYKEEPER, a non-profit corporation,

Plaintiff,

vs.

MARINE EXPRESS, Inc.,

Defendant.

Case No. C-13-5550-JCS

**MOTION TO RESCHEDULE THE CASE MANAGEMENT CONFERENCE AND ASSOCIATED DEADLINES;
[PROPOSED] ORDER**

Judge: Hon. Joseph C. Spero

WHEREAS, on Dec 2, 2013, Plaintiff San Francisco Baykeeper filed the above-entitled complaint;

WHEREAS, Plaintiff postponed serving Defendant Marine Express, Inc. with the complaint in good-faith pursuit of settlement to avoid the need for litigation;

WHEREAS, Plaintiff and Defendant are continuing to engage in settlement negotiations and anticipate reaching a settlement within the next month;

WHEREAS, the Initial Case Management Conference is scheduled for February 28, 2014, at 1:30 pm;

WHEREAS, the Scheduling Order states that if the Initial Case Management Conference is

1 continued, the other deadlines are continued accordingly;

2 WHEREAS, Plaintiff requests, upon the Court's approval, to reschedule the Case
3 Management Conference for March 28, 2014, at 1:30 pm, or at such later date that is convenient for
4 the Court, in order to give the Parties a chance to complete settlement negotiations without involving
5 the resources of the Court;

6 WHEREAS, Plaintiff requests, upon the Court's approval, to reschedule the deadlines to file
7 an ADR Certification and to file a Rule 26(f) Report to align with the new proposed Case
8 Management Conference date;

9 WHEREFORE, Plaintiff respectfully requests the Court to approve and enter the Proposed
10 Order below.

11
12 Dated: January 31, 2014

13 Respectfully submitted,

14 SAN FRANCISCO BAYKEEPER

15 By: /s/ Sejal Choksi-Chugh

16 Sejal Choksi-Chugh

17 Attorney for Plaintiff

18 SAN FRANCISCO BAYKEEPER

19

20

21

22

23

24

25

26

27

28

1 [PROPOSED] ORDER
2
3
4
5 IT IS SO ORDERED.
6
7
8 Dated: 2/3/14
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



